

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JODY LOMBARDO AND BRYAN)
GILBERT,)
)
Plaintiffs,)
)
vs.) Cause No. 4:16-cv-01637-NCC
)
SAINT LOUIS CITY, ET AL.,)
)
Defendants.)

VIDEOTAPED DEPOSITION OF DR. JANE TURNER

Taken on behalf of Plaintiffs
May 29, 2018

ALARIS LITIGATION SERVICES
711 N. 11TH STREET
ST. LOUIS, MO 63101
(314) 644-2191

PLAINTIFF'S
EXHIBIT

16

exhibitsticker.com

1 A I don't know.

2 Q Okay. Were you generally told that there
3 were three to four officers at a time restraining
4 Mr. Gilbert on the ground?

5 A Yes.

6 Q And that they took turns, they'd get tired
7 and somebody else would replace the next one?

8 A Yes.

9 Q And is it your understanding -- well, were
10 you told that they continued to hold him on the ground
11 prone after he was handcuffed and had his legs bound?

12 A Yes.

13 Q Okay. And you said the whole incident, your
14 understanding, was less than five minutes; right?

15 A That's my impression.

16 Q Okay. In any event, in your report, you
17 indicate that forcible restraint is one of the causes
18 of death; right?

19 A It's combined with Mr. Gilbert's heart
20 disease and high concentration of methamphetamine in
21 his blood.

22 Q Okay. And just to be specific; so you've
23 listed three different things under immediate cause of
24 death; correct?

25 A Yes.

1 Q And one of them is heart disease; correct?

2 A Yes.

3 Q Another one is methamphetamine use; correct?

4 A Yes.

5 Q And the other one is forcible restraint;
6 correct?

7 A Yes.

8 Q And so we agree -- we both agree that
9 forcible restraint contributed to cause his death;
10 correct?

11 A Yes.

12 Q And what is forcible restraint? What do you
13 mean when you use those words?

14 A What I mean by forcible restraint is that
15 there is a struggle involved in which the individual
16 is combating with the people trying to restrain him or
17 her.

18 Q Okay. And in this case, you were aware the
19 forcible restraint involved someone being in the prone
20 position; correct?

21 A Yes.

22 Q And with their hands cuffed behind -- his
23 hands cuffed behind his back?

24 A Yes.

25 Q And with his legs bound?